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**VIA ECF**

The Honorable Richard J. Sullivan  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

***Re: Murphy et al. v. LaJaunie et al.***  
***Case Number: 13 CV 6503 (RJS)***

Dear Judge Sullivan:

We represent the Defendants in the above referenced matter. We write in accordance with the Court's July 6, 2016 Order directing Defendants to provide a report describing the contents of the twelve (12) boxes referred to in Defendants' July 6, 2016 letter.

Yesterday, in a further attempt by this firm to comply with the Court's directives, my associate Aaron N. Solomon, was dispatched to Defendants' John Street restaurant to review and catalogue their contents. As there were no resources available to us on site to copy the contents of the boxes, and as production of the documents must occur by today, we organized the contents of each box and directed Defendants to produce the original documents to Plaintiffs.

The following chart summarizes the contents of each box:

<b>Box Number<sup>1</sup></b>	<b>Restaurant</b>	<b>Description of Documents</b>	<b>Time Period</b>
1	John Street	Payroll Records <sup>2</sup>	January, 2009 – July, 2009; January, 2010; December, 2011; September, 2011.

<sup>1</sup> Each box was labeled numerically to correspond with this index.

<sup>2</sup> Where the term "Payroll Records" is used, the box contained weekly ADP payroll records for all employees (inclusive of class members) for the corresponding restaurant for the time period indicated.

<b>Box Number</b>	<b>Restaurant</b>	<b>Description of Documents</b>	<b>Time Period</b>
2	John Street	Payroll Records	W/E <sup>3</sup> July 6, 2007 – July 21, 2007.
2	John Street	Unredacted Tip Sheets	September, 2006 – December, 2006; January, 2007 – June, 2007; December, 2013.
2	Park Avenue	Unredacted Tip Sheets	November, 2013; December, 2013, January, 2014 – May, 2014.
3	John Street	Payroll Records	March, 2010 – May, 2010; November, 2011; W/E September 17, 2011 – W/E September 24, 2011.
3	Park Avenue	Payroll Records	May, 2011 – June, 2011.
4	John Street	Payroll Records	W/E July 11, 2009 – W/E August 1, 2009; W/E August 8, 2009 – W/E August 29, 2009.
4	Park Avenue	Payroll Records	February, 2009; W/E June 6, 2009 – W/E July 4, 2009; W/E April 11, 2009 – W/E May 2, 2009.
4	Park Avenue	Payroll Journals <sup>4</sup>	January 3, 2009 – August 1, 2009.
5	Park Avenue	Payroll Records	W/E September 4, 2010 – W/E December 25, 2010; W/E March 5, 2011 – W/E March 26, 2011.

<sup>3</sup> As used herein the term “W/E” means week ending.

<sup>4</sup> Payroll Journals are distinct from payroll records. However, Payroll Journals also contain portions of ADP payroll records for the time periods listed.

<b>Box Number</b>	<b>Restaurant</b>	<b>Description of Documents</b>	<b>Time Period</b>
5	John Street	Payroll Records	W/E November 6, 2010 – W/E December 25, 2010.
6	Park Avenue	Payroll Records	W/E April 2, 2011 – W/E April 30, 2011; W/E October 1, 2011 – W/E November 27, 2011; W/E December 31, 2011.
7	Park Avenue	Payroll Records	W/E January 3, 2010 – W/E April 3, 2010; W/E May 8, 2010 – July 31, 2010; W/E August 14, 2010 – W/E August 28, 2010.
7	John Street	Payroll Records	W/E February 2, 2010; W/E February 20, 2010; W/E February 27, 2010.
8	John Street	Payroll Records	W/E January 1, 2011 – W/E May 28, 2011; W/E June 27, 2011 – W/E August 27, 2011; W/E October 1, 2011 – W/E October 29, 2011.
9	John Street	Payroll Records	W/E September 12, 2009 – W/E January 2, 2010.
9	Park Avenue	Payroll Records	W/E January 3, 2009 – W/E January 31, 2009; W/E March 7, 2009 – W/E April 14, 2009; W/E May 3, 2009 – W/E May 23 2009.

Box Number	Restaurant	Description of Documents	Time Period
10	Park Avenue	Payroll Records	W/E January 1, 2011 – W/E January 29, 2011; W/E February 5, 2011 – W/E February 26, 2011; W/E August 6, 2011 – W/E August 27, 2011; W/E September 3, 2011 – W/E September 24, 2011.
10	John Street	Payroll Records	W/E June 12, 2010 – W/E July 3, 2010.
11	Park Avenue	Payroll Records	W/E July 2, 2011 – W/E August 6, 2011.
11	John Street	Payroll Records	W/E July 10, 2010 – W/E October 30, 2010.
12	Park Avenue	Payroll Records	W/E July 11, 2009 – W/E January 2, 2010.

Thank you for your consideration of the foregoing.

Respectfully submitted,  
Kaufman Dolowich & Voluck, LLP



Jeffery A. Meyer, Esq.

CC: All Counsel, Via ECF